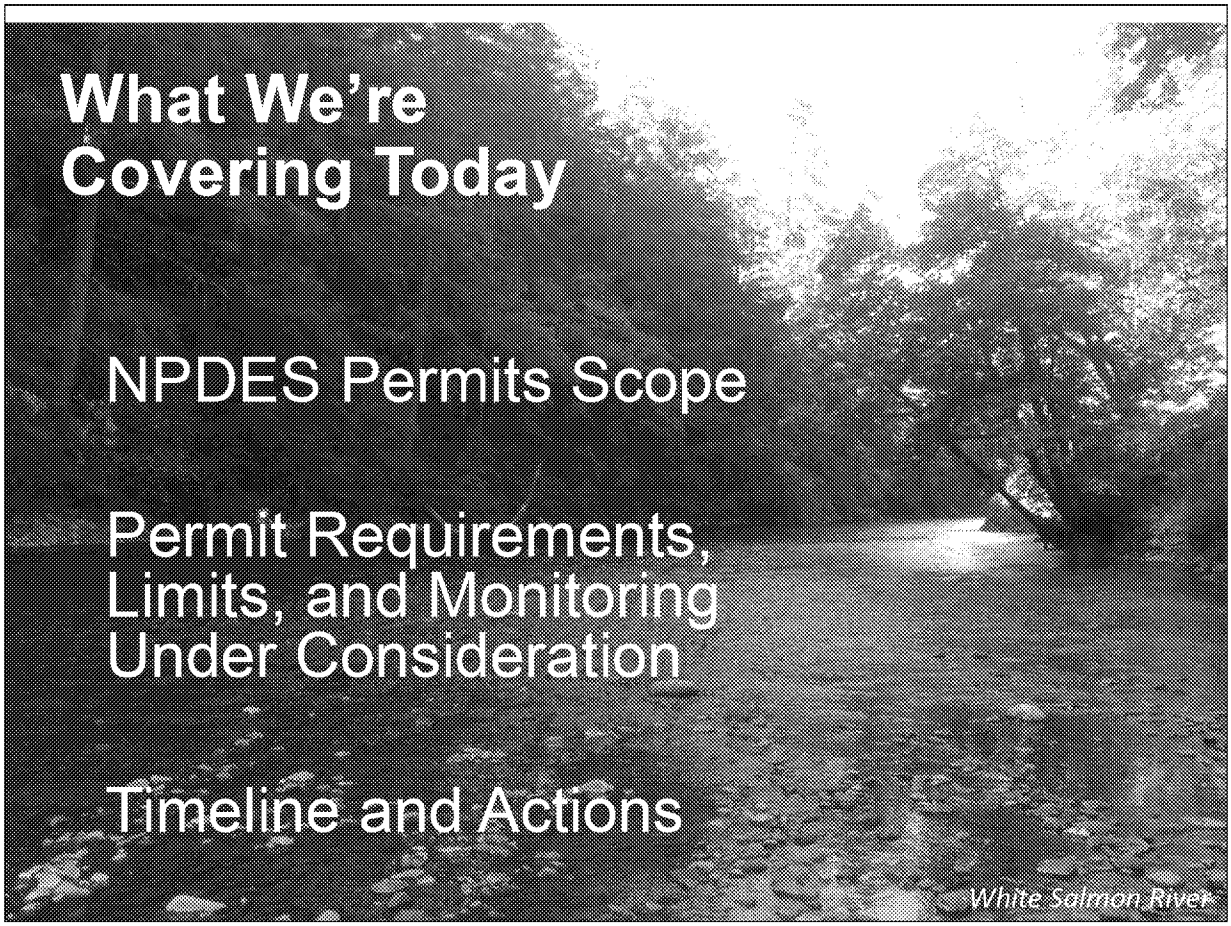
Upcoming NPDES permits for Lower Columbia River, Lower Snake River, and Grand Coulee Dams

Jenny Wu, EPA Region 10

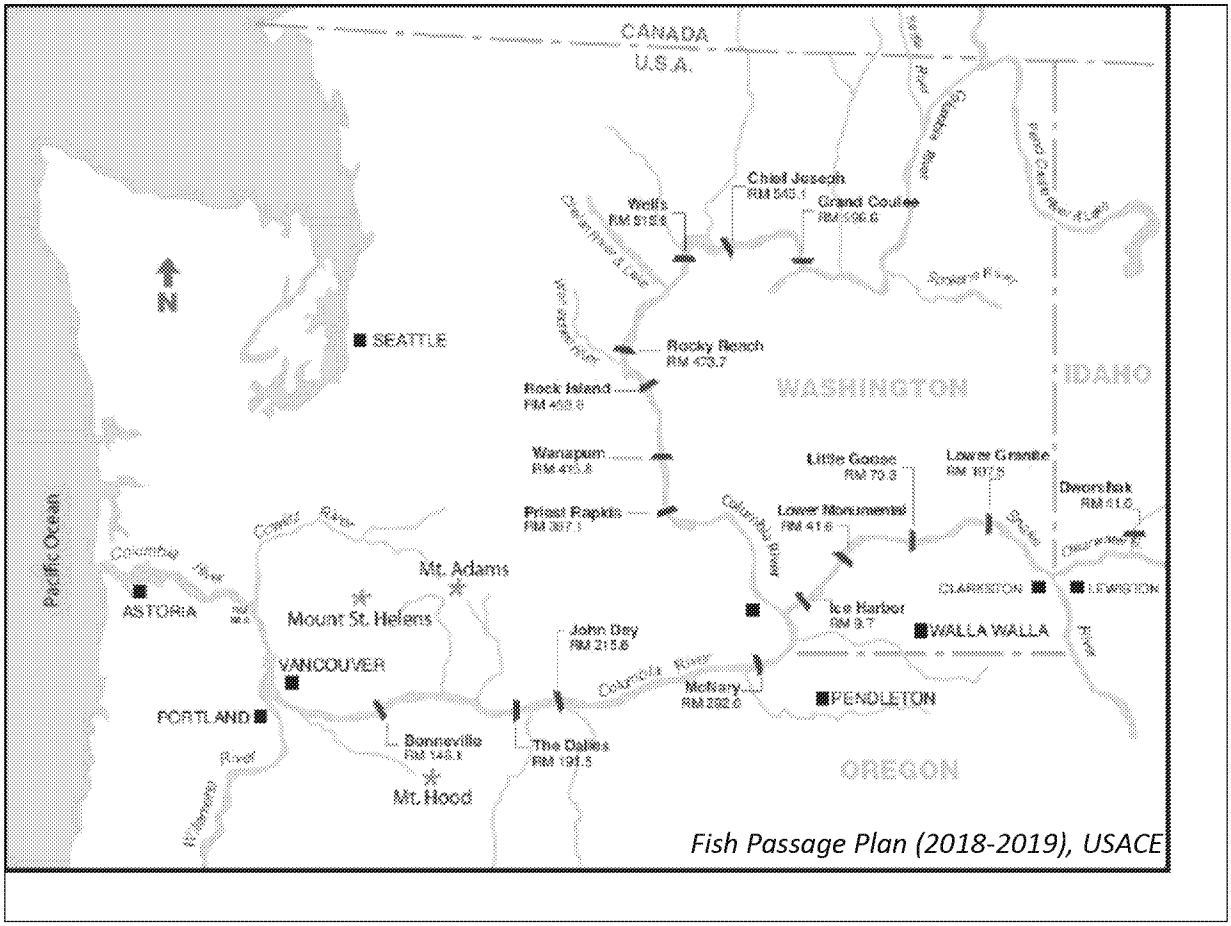
Federal Caucus Meeting, Portland, OR

September 18, 2018

Hood River



Go over which permits EPA is working on, what it's going to cover, our thinking on permit conditions, and different actions that are needed to issue the permit.



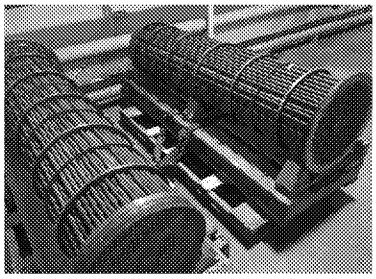
Fish Passage Plan (2018-2019), USACE

- Applications submitted – The Dalles submitted a permit application requesting coverage under NPDES;
Lawsuit filed in 2013; – agreement with Columbia Riverkeeper (2014) – address oil and grease and cooling water – subject to NPDES but discharging without a permit;
Corps and BOR Settlement Agreement to submit applications.

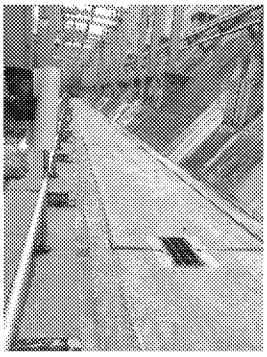
Plan to issue a GP for WA hydroelectric facilities
Issued Draft GP earlier this year, April 2018

In July, EPA Administrator issued initiative to finish all new permits in 6 months (by end of 2018)

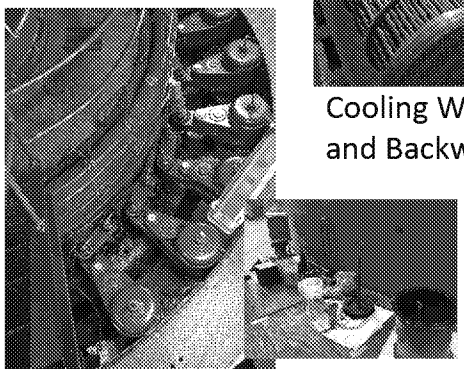
What is covered under the permit?



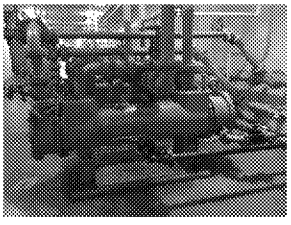
Cooling Water Discharges and Backwash Strainers



Drains, Sumps



Wicket gates, in-line equipment, lubricated wires

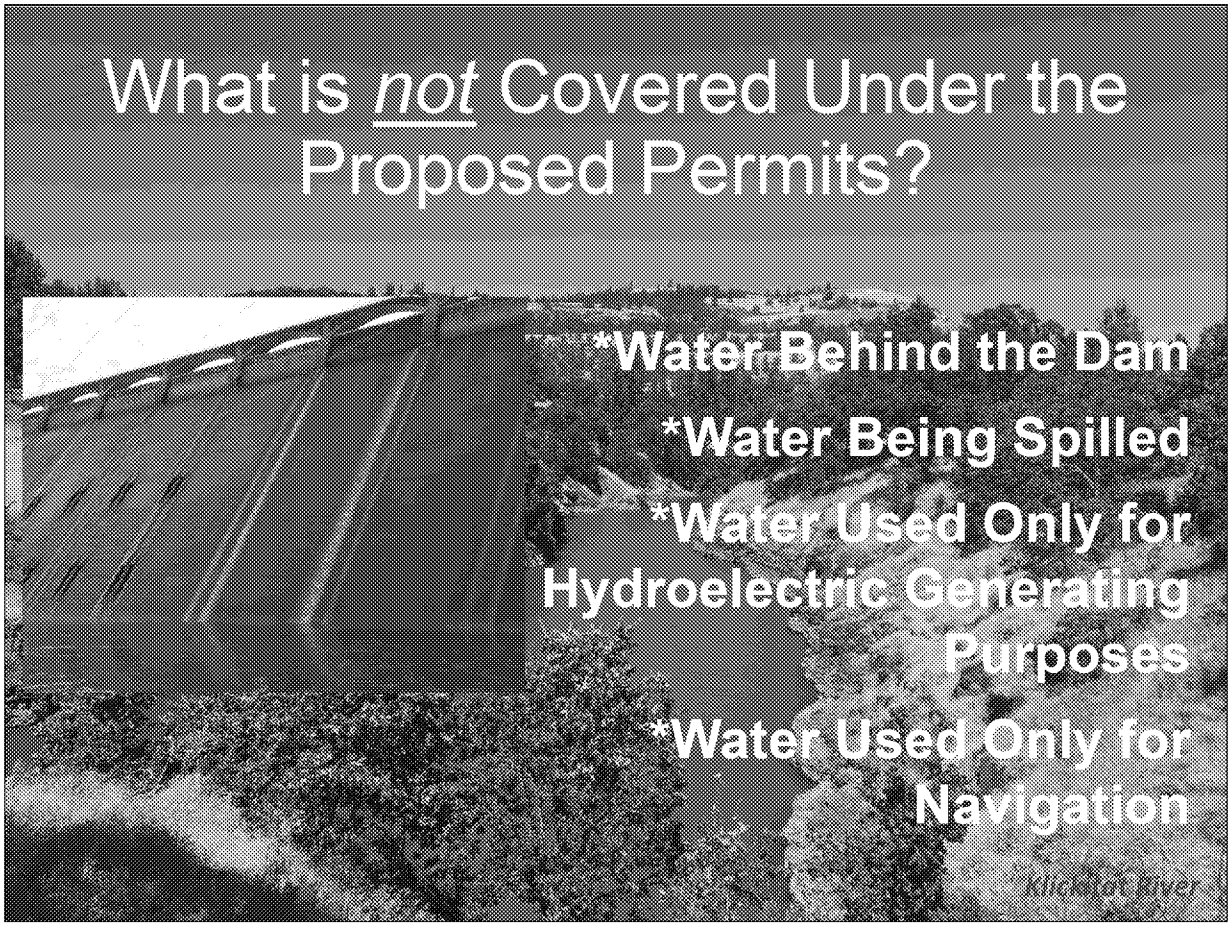


Cooling Water Intake Structures

The main emphasis of the permit are looking at oil and grease impacts and making sure that oil leaks and oil spills do not occur, or are identified and addressed.

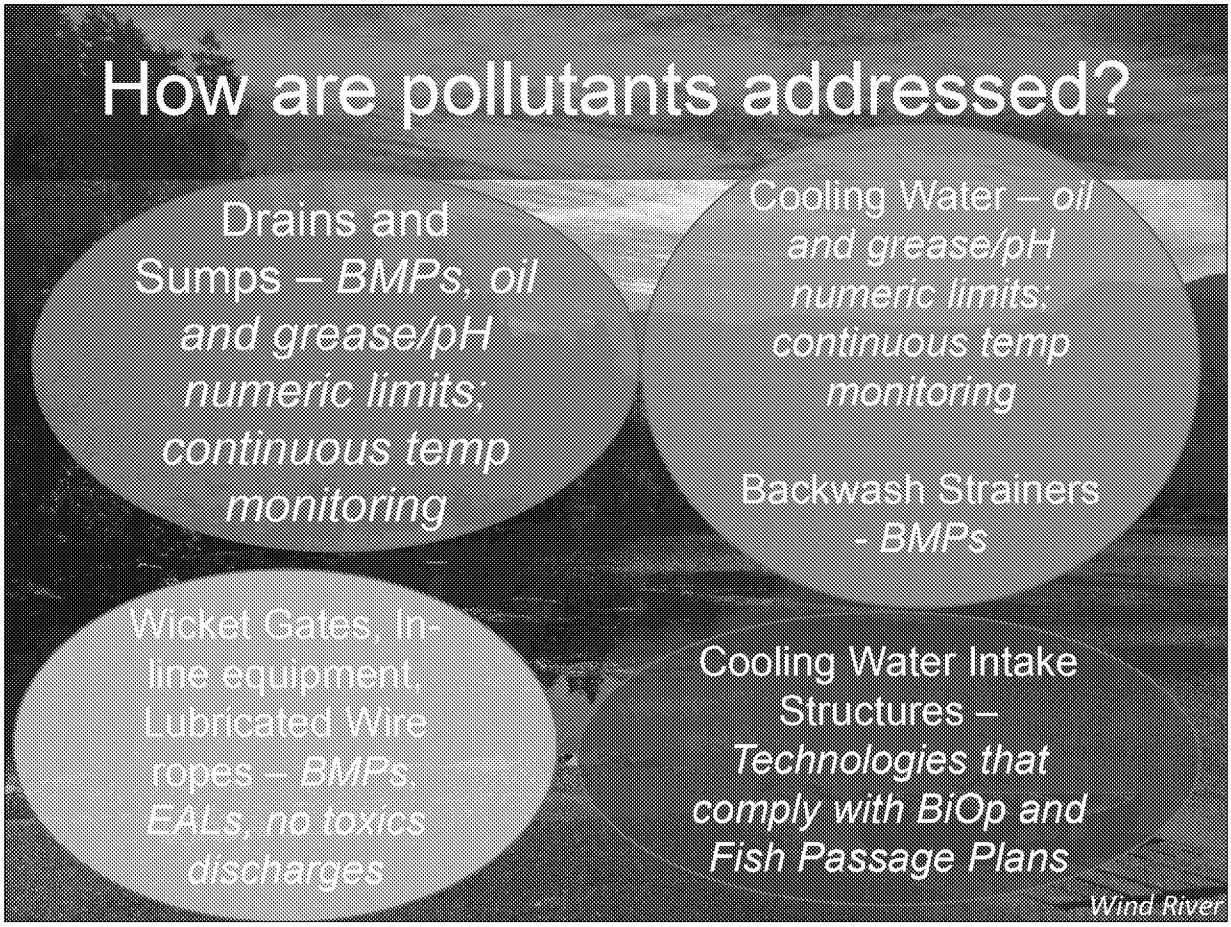
Drains and sumps – main collection of oil and grease, incidental cooling
Wicket gates, in-line equipment, lubricated wires, - oil and grease for luibrication – water coming into contact could discharge to river
Cooling water – temperature, oil and grease if there are breaks in the pipes

The cooling water intake structure is an exception to oil and grease impacts. Whenever a permittee is subject to NPDES and has cooling water discharges, they are subject to the CWA Statute, which has implementing regulations.
Cooling water intake structures – where water is taken in, minimize adverse effects to fish from impingement or entrainment



What is not covered by the permit?

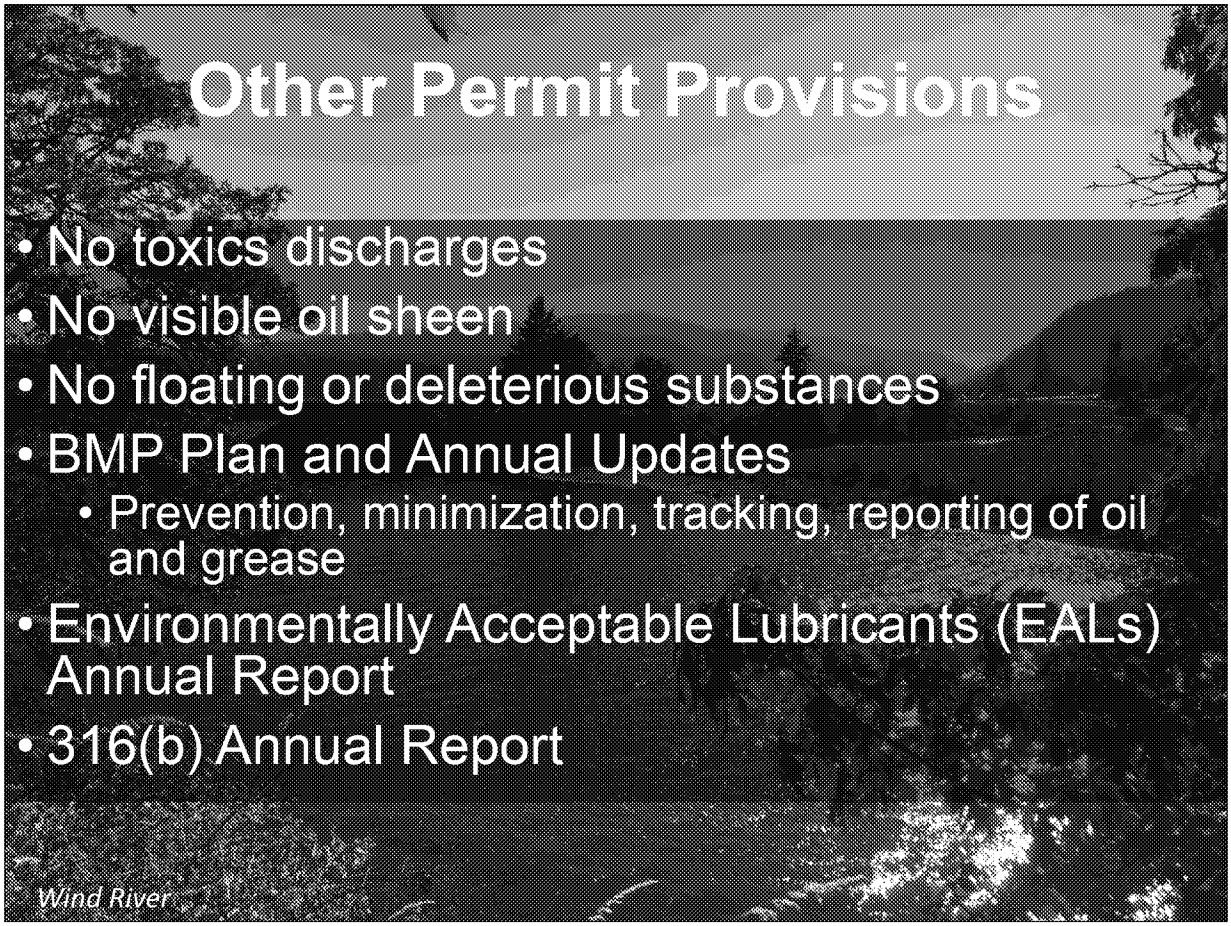
Any water that is "passed through" the dam for other purposes, but pollutant isn't added is considered a "pass through" water and not regulated under NPDES. This is based on two court decisions in the 90s. Examples include water behind the dam, water that is spilled over the dam, water that enters an inflow and goes through the turbine and passes out (without adding any pollutants) of the turbine, or water in a navigation lock.

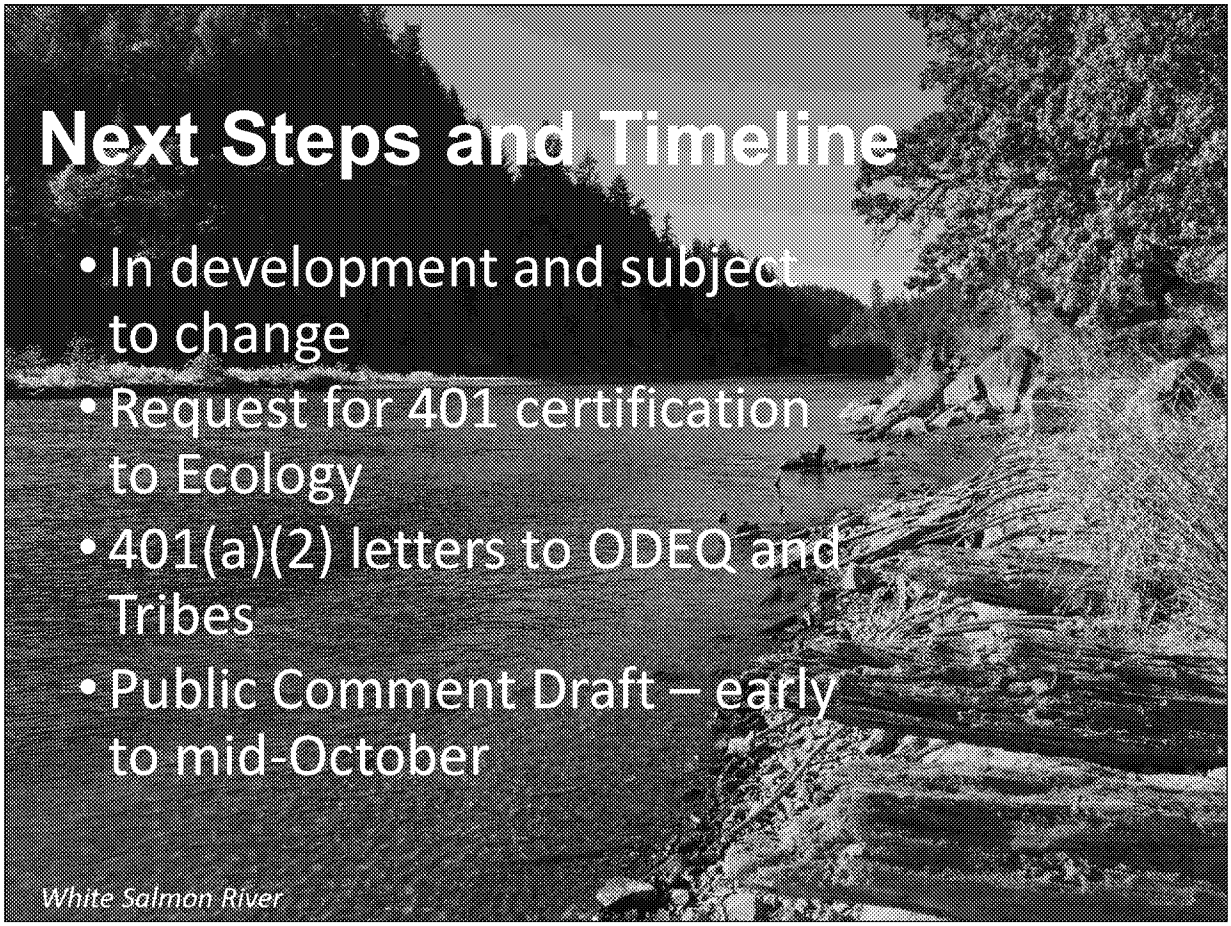


Different ways to address different sources of pollutants.
Drains and sumps and cooling water – traditional ways you'd think of a permit with effluent limits and monitoring requirements - Recall drains and sumps collect water from various points – these will have numeric limits for oil and grease and pH – will be in the ballpark of the Idaho permit which is a daily maximum of 10 mg/L.
This is also in conjunction with a narrative limitation that does not allow oil sheen.
Drains and sumps will also have continuous temperature monitoring if they receive.
-Cooling water discharges – also have oil and grease and pH numeric limits;

Other Permit Provisions

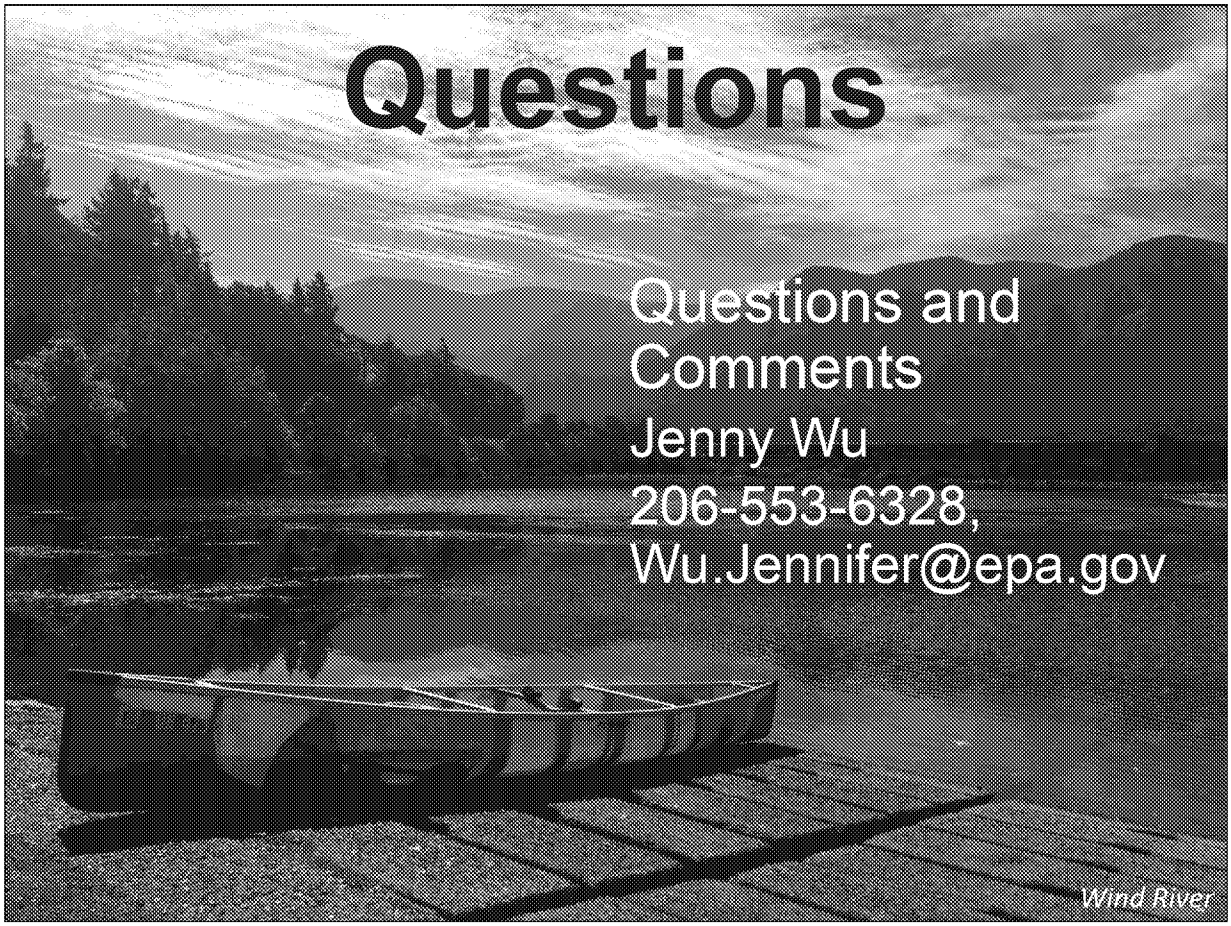
- No toxics discharges
- No visible oil sheen
- No floating or deleterious substances
- BMP Plan and Annual Updates
  - Prevention, minimization, tracking, reporting of oil and grease
- Environmentally Acceptable Lubricants (EALs) Annual Report
- 316(b) Annual Report




Next Steps and Timeline
• In development and subject to change
• Request for 401 certification to Ecology
• 401(a)(2) letters to ODEQ and Tribes
• Public Comment Draft – early to mid-October
White Salmon River


Next Steps and Timelines (continued)
• Ongoing tribal coordination and consultation, if requested
• ESA consultation
• Issuance Date Goal: End of November or Beginning of December
White Salmon River

Data gaps


Questions
Questions and Comments
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Wind River